

EXHIBIT A



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Transcript of the Testimony of **Natalie Reeser**

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1 ad on Craig's List during working hours?

2 MR. FLYNN: Objection. Asked and answered.

3 THE WITNESS: It was incorrect.

4 Q (Continuing by Mr. Miglio): Okay. Does that refresh your
5 recollection as to whether or not you were fired or you
6 voluntarily resigned from Jeffrey Automotive Group?

7 A I don't remember.

8 Q Don't remember? You went through an unemployment hearing
9 and you don't remember whether you were fired or you
10 quit?

11 A Oh, I'm sure, then, if I was at unemployment that they
12 fired me.

13 Q Okay. And do you remember why they told you you were
14 fired?

15 A For that Craig's List ad, now that I read it.

16 Q What happened to this lawsuit?

17 A My attorney had some personal issues and she kind of just
18 disappeared on me.

19 Q Just disappeared on you?

20 A Correct.

21 Q Where did she go?

22 A I have no clue. She called me one day and said, "Do you
23 want to settle for 20,000?" I said, "No," and I never
24 heard from her again.

25 Q Never heard from her again.

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1 A Correct.

2 (Exhibit 21 marked.)

3 Q (Continuing by Mr. Miglio): I show you what's been marked
4 as Exhibit 21 and ask you to take a look at that. Have
5 you ever seen Exhibit 21 before?

6 A No.

7 Q Have you ever seen the letter that's attached to Exhibit
8 21?

9 A Yes.

10 Q Now, it doesn't say here that she's disappearing or
11 anything.

12 A She didn't like the fact that I didn't take the
13 settlement for 20,000 and decided she didn't want to be
14 my attorney anymore.

15 Q Did you tell her you were looking to obtain 150,000?

16 MR. FLYNN: Objection. Attorney-client
17 privilege.

18 THE WITNESS: No.

19 MR. MIGLIO: No, you didn't tell her that?

20 MR. FLYNN: And I'm instructing the witness not
21 to answer.

22 Q (Continuing by Mr. Miglio): So the letter that she wrote
23 and submitted to the Court about you looking to obtain
24 \$150,000 from Jeffrey Automotive Group is wrong?

25 MR. FLYNN: Same objection. And I'm

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1 instructing the -- I'm instructing Miss Reeser not to
2 answer.

3 MR. MIGLIO: On what basis?

4 MR. FLYNN: On the basis --

5 MR. MIGLIO: I'm asking her about a document
6 that was a court document.

7 MR. FLYNN: You're asking for any conversations
8 between her and her attorney.

9 MR. MIGLIO: No, just if you'd listen to the
10 question, maybe you'd --

11 MR. FLYNN: I just did.

12 MR. MIGLIO: Looking at the letter, is the
13 letter incorrect where it says that you were looking to
14 obtain \$150,000 from the Jeffrey Automotive Group?

15 MR. FLYNN: Objection. Calls for the witness
16 to discuss attorney-client privileged information.

17 MR. MIGLIO: It doesn't require her to do any
18 such thing. I'm asking her --

19 MR. FLYNN: Yes, it does.

20 MR. MIGLIO: -- if that's true.

21 MR. FLYNN: -- because she has to disclose what
22 they said to her.

23 MR. MIGLIO: No. She could be looking to
24 obtain that amount from her -- on her own. She doesn't
25 have to communicate that to her lawyer.

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1 MR. FLYNN: Well, any discussions --

2 MR. MIGLIO: Don't waste my time with that.

3 MR. FLYNN: No, you can't have that kind of
4 information. It's privileged and I'm instructing the
5 witness not to answer.

6 MR. MIGLIO: Well, we're going to make a
7 record, because we're going to go in front of the judge.

8 MR. FLYNN: That's fine.

9 MR. MIGLIO: Look at the Exhibit 1 to the
10 motion that your attorney filed.

11 THE WITNESS: Which exhibit?

12 MR. MIGLIO: The letter.

13 THE WITNESS: What page?

14 MR. FLYNN: I think that he's referring to this
15 letter.

16 THE WITNESS: Hm-hmm.

17 MR. FLYNN: Yeah, that's correct.

18 Q (Continuing by Mr. Miglio): So read the second sentence
19 in that first paragraph and tell me if that's true.

20 A I'm not going to answer anything on this document,
21 because this was a conversation between me and my
22 attorney.

23 Q Well, unless your attorney instructs you not to answer,
24 we'll go to the Court and get this resolved.

25 MR. FLYNN: Well, I'm instructing her not to

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1 answer because --

2 THE WITNESS: It's the same question.

3 MR. FLYNN: -- the sentence says, "As we
4 discussed, we do have a disagreement regarding our
5 opinions of your case and the likely value of your case."
6 That sentence right there you're asking her to either
7 agree or reject it, which requires --

8 MR. MIGLIO: I'm not asking her that.

9 MR. FLYNN: Which requires her to go into
10 attorney-client privileged information.

11 MR. MIGLIO: I'm not asking her to do that, if
12 you'd just listen.

13 MR. FLYNN: You are.

14 MR. MIGLIO: Did you have an opinion --

15 MR. FLYNN: And what's the relevance anyway to
16 any of this?

17 MR. MIGLIO: Did you have an opinion -- I need
18 to explain that to you?

19 MR. FLYNN: Yeah.

20 MR. MIGLIO: Really?

21 MR. FLYNN: Yeah, really.

22 MR. MIGLIO: I'm not going to.

23 THE WITNESS: I would like to know the
24 relevance.

25 MR. FLYNN: Of course. You can't.

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1 Q (Continuing by Mr. Miglio): Did you have an opinion that
2 you were entitled to \$150,000 from Jeffrey Automotive
3 Group?

4 MR. FLYNN: Objection. If it -- You can
5 disclose your own internal perception. You can't
6 disclose anything that was communicated to your attorney.

7 THE WITNESS: I never gave my attorney an
8 amount.

9 Q (Continuing by Mr. Miglio): So the statement here that
10 you had an opinion that the case was worth \$150,000,
11 that's not correct; is that right?

12 MR. FLYNN: Same objection. If it calls for --
13 If you have to discuss anything that you discussed with
14 your attorney, don't disclose that.

15 MR. MIGLIO: So is it correct, Miss Reeser,
16 that you didn't have an opinion that the case was worth
17 \$150,000?

18 MR. FLYNN: Objection, asked and answered. You
19 can answer only to your opinion, not to any
20 communication you made --

21 THE WITNESS: I already answered, Keith. I
22 have no other opinion.

23 MR. MIGLIO: She didn't answer, so.

24 MR. FLYNN: Yeah, she did.

25 MR. MIGLIO: You deal with it or I will. Okay?

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1 I'll get the Judge on the phone now.

2 MR. FLYNN: That's fine. I'm happy to talk to
3 the Judge.

4 MR. MIGLIO: All right. I'll get him on the
5 phone. Let's take a break.

6 (Whereupon a recess was taken at or about the
7 hour of 11:30 a.m., and the deposition was resumed at or
8 about the hour of 11:49 a.m.)

9 THE WITNESS: I gave my opinion, and I don't
10 remember having a conversation with her.

11 Q (Continuing by Mr. Miglio): Didn't ask you whether you
12 remember having a conversation with her.

13 A About a dollar figure.

14 Q I asked you -- And I don't want to know about
15 conversations you had with your counsel. I want to know
16 whether or not you had an opinion that the Jeffrey
17 Automotive case was worth \$150,000.

18 A I didn't have an opinion on the case. My attorney was my
19 opinions.

20 Q So the answer is you did not have an opinion that the
21 Jeffrey Automotive Lawsuit that you filed was worth
22 \$150,000.

23 MR. FLYNN: Objection. Asked and answered.

24 Q (Continuing by Mr. Miglio): Is that correct?

25 A I answered that, sir.

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1 Q Well, we'll read it back and we'll get an answer.

2 MR. FLYNN: Yeah, please read the record back
3 and read her answer back.

4 MR. MIGLIO: Just read the question.

5 MR. FLYNN: No, read the answer, because --

6 THE WITNESS: The answer.

7 MR. FLYNN: -- the answer's important for the
8 objection.

9 (Whereupon the following portion of the
10 transcript was read as follows:

11 "Q So the answer is you did not have an
12 opinion that the Jeffrey Automotive Lawsuit that you
13 filed was worth \$150,000.

14 MR. FLYNN: Objection. Asked and answered.")

15 THE WITNESS: Correct.

16 Q (Continuing by Mr. Miglio): What did you say?

17 A That's the exact same thing I said before.

18 Q What did you just say?

19 A It was the exact same thing I said before.

20 Q And what was that?

21 MR. FLYNN: Objection. Asked and answered.
22 She once, again, has told you on several occasions now,
23 counsel.

24 MR. MIGLIO: What did he say about speaking
25 objections? Do you remember that?

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1 (Exhibit 22 marked.)

2 Q (Continuing by Mr. Miglio): Let me show you what's been
3 marked as Exhibit 22.

4 MR. FLYNN: Read it carefully.

5 THE WITNESS: I already know what's in this.

6 Q (Continuing by Mr. Miglio): What are these documents?

7 A They're the reason they said they were letting me go.

8 Q And what are the photos that appear as the last two pages
9 of Exhibit 22?

10 A That's the Craig's List ad they referred to.

11 Q This is what you put on Craig's List?

12 A Yep. Yes.

13 Q While working there.

14 A Everyone was allowed to use the computers.

15 Q While working there. You put these ads on Craig's List
16 while you were employed, during the time; is that right?

17 A I won my unemployment case. I did nothing wrong.

18 Q Did you hear my question?

19 A I answered your question.

20 Q I said did you post these ads on Craig's List while you
21 were employed at Jeffrey Automotive Group?

22 A Yes.

23 Q Thank you.

24 A Hm-hmm.

25 Q Did you ever post any ads on Craig's List or any other

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1 social media site while you were working at the Clinton
2 Township lab or any other lab within Henry Ford Health
3 System?

4 A No.

5 Q Can you look at the second page of Exhibit 22?

6 A Hm-hmm.

7 Q And read through those four or five paragraphs there and
8 tell me whether those are accurate.

9 A No.

10 Q Which of them aren't accurate?

11 A The first paragraph is inaccurate.

12 Q Okay.

13 A The second paragraph is inaccurate, the third paragraph
14 is inaccurate, and the fourth paragraph is fine.

15 (Exhibit 23 marked.)

16 Q (Continuing by Mr. Miglio): I show you what's been marked
17 as Exhibit 23. Have you ever seen these documents
18 before?

19 A I don't know what this is.

20 Q Do these look like things that you were posting on the
21 internet when you worked for Jeffrey Automotive?

22 MR. FLYNN: Objection. Foundation.

23 THE WITNESS: I have no clue, sir.

24 Q (Continuing by Mr. Miglio): None of them are familiar to
25 you?

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1 A None of these are posts.

2 Q Well, do these look like sites you went to or things you
3 saw while you were on the computer at Jeffrey Automotive
4 Group?

5 A I have no clue.

6 MR. FLYNN: Same objection.

7 THE WITNESS: I don't know who put this packet
8 together and I have no clue.

9 Q (Continuing by Mr. Miglio): Do you have a Facebook page?

10 A Yes, I do.

11 Q Any other social media sites that you subscribe to?

12 A No. I had a Myspace page, but when Myspace shut down or
13 whatever, wasn't popular anymore, I never got back on, so
14 I haven't been on that in a long time.

15 Q (Continuing by Mr. Miglio): So what happened to the
16 lawsuit that you had against Jeffrey Automotive Group?

17 A I already answered that.

18 Q Well, was it settled? Dismissed? What?

19 A It was dismissed because me and my attorney couldn't come
20 to an agreement.

21 Q And you didn't have the opportunity to get another
22 attorney; is that what you're saying?

23 A I couldn't afford another attorney at the time, sir.

24 Q So you were afforded an opportunity to get another
25 attorney, but couldn't find one; is that what you're

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1 saying?

2 A No. I didn't look for one. I just let it go.

3 Q Any other lawsuits or legal proceedings that you've been
4 involved in other than this case and other than --

5 A The flood.

6 Q -- the Jeffrey Automotive Group lawsuit?

7 A The flood.

8 Q What's the flood?

9 A I was -- My apartment was flooded by my apartment complex
10 while employed at Henry Ford.

11 Q And what happened with that one?

12 A It was a class action lawsuit, never had to go to court,
13 never had to testify, and we all won a thousand bucks.

14 Q Any other lawsuits or legal proceedings?

15 A No.

16 Q Did you ever file for bankruptcy?

17 A Yes.

18 Q When did you file for bankruptcy?

19 A 2011, I believe.

20 Q When were you -- What was the outcome of that case?

21 A I was granted bankruptcy.

22 Q Was an order of discharge entered?

23 A I don't know what that means.

24 Q Were you discharged from the debts?

25 A Yes.

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1 Q Do you remember what debts you had?

2 A Mostly hospital.

3 Q And that was for what?

4 A Injuries that I had sustained when I was younger.

5 Q Do you remember what healthcare facilities you had --
6 owed money to?

7 A No.

8 Q Were some of those facilities Henry Ford Health System
9 facilities?

10 A I have no clue, sir.

11 Q Don't know where you were treated; is that what you're
12 saying?

13 A I don't know if they were included in a bankruptcy. I
14 don't have them in front of me, so I wouldn't be able to
15 answer that.

16 Q What's your educational background?

17 A I have two years of college at Rochester Christian
18 College.

19 Q Did you get a degree?

20 A Nope.

21 Q What was the course of study you were involved in?

22 A Political science.

23 Q Is that the only post high school education you've had?

24 A No. I went to Davenport for one year.

25 Q What did you study at Davenport?

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1 A Business. I went to Kirtland Community College while I
2 also dually enrolled in high school and got
3 certifications in art.

4 Q What do you mean certifications? What kind of
5 certifications?

6 A Certifications in painting. Certifications to teach
7 children. Drawing. Fundamentals of art.

8 Q So what's the sum total of post-high school education
9 you've had? How many college courses have you taken?

10 A I have no clue.

11 Q How many years or months did you spend in college?

12 A Including high school years, four.

13 Q In college?

14 A I went to college while I went to high school. It's
15 called dual enrollment.

16 Q So what years were you dual enrolled?

17 A One year.

18 Q Okay. So in addition to the one year where you were dual
19 enrolled, how many other years did you spend pursuing a
20 college education?

21 A Three. Two at Rochester Christian College; one at
22 Davenport.

23 Q Have you ever seen a psychologist or a therapist?

24 A Long time ago, yes.

25 Q Who was that?

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1 A 20 milligrams of Paxil.

2 Q Okay. And what were you seeing the person for? Anxiety?

3 A Anxiety.

4 Q And you said that you had some kind of traumatic
5 experience which caused you to seek counseling with this
6 person; is that right?

7 A Correct.

8 Q And what was that?

9 A I was raped.

10 Q When was that?

11 A In 2000.

12 Q Okay. Where was that -- did that occur?

13 A It occurred in Dryden.

14 Q Dryden, Michigan?

15 A Yes.

16 Q Did you make a police report?

17 A I'm sure there was a police report.

18 Q Was there a prosecution?

19 A No.

20 Q Was the perpetrator apprehended?

21 A Yes.

22 Q And what happened to him?

23 A You would have to understand the whole story, but he
24 was -- the evidence was signed away, so he got away
25 scot-free.

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1 A I did.

2 Q So you saw this social worker for, you said, a year or
3 two?

4 A Yes.

5 Q Is that clinic still there?

6 A I have no clue.

7 Q And then what caused you to stop seeing the social
8 worker?

9 A I probably didn't have insurance anymore.

10 Q Where were you working at the time?

11 A I wasn't working. I was going to college. Well, I was
12 working probably for a gym at the time during college. I
13 don't remember the name of the gym. That was early --
14 early when I was a freshman, so.

15 Q What gym was it, do you remember?

16 A I have no clue. It's not there anymore. It was in
17 Rochester Hills. They now have built a big fitness
18 center over it.

19 Q So since seeing this psychologist, social worker, have
20 you seen anybody else for any depression, anxiety, any
21 mental or emotional conditions?

22 A Yes. I went to my personal primary care doctor, Dr.
23 Kahnamoui, after this incident with Henry Ford, because
24 my anxiety came back, my panic attacks came back, I
25 needed medicine. This has put so much stress on me that

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1 I started having flashbacks of all these -- Just it
2 wasn't a good situation. It caused anxiety.

3 Q All right. So tell me then, again now, when did you
4 start treating with the doctor for depression or anxiety?

5 A I went to see him after my -- I was walked out the door
6 by security on my last day. I went to see him soon after
7 that, because the medicine wasn't working, it made me
8 very depressed, it made me very anxious, very scared, I
9 didn't know what was going on, I didn't know why it was
10 happening to me, and I needed help.

11 Q So my question is, though, when did Dr. Kahnamoui start
12 treating you for anxiety or depression or any mental or
13 emotional problems?

14 A Soon after I was released from Henry Ford.

15 Q And do you remember -- When was the last time you saw
16 that doctor?

17 A I just saw him in December or November, because I had a
18 nervous breakdown, and he took me off work for a week and
19 upped my medicine.

20 Q What do you mean you had a nervous breakdown?

21 A All the stress that this lawsuit has caused me has been
22 tremendous.

23 Q Okay. And it hasn't had anything to do with your breakup
24 or your --

25 A No. It all has to do with --

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1 Q -- fiance dropping you?

2 A -- me going to the State and what Fiona did to me.

3 Q So are you saying that prior to leaving the -- Strike
4 that. Prior to leaving the employment of Henry Ford
5 Health System you weren't being treated by Dr. Kahnamoui
6 for any anxiety for depression.

7 A Just my regular Paxil pills that I've been taking for 10
8 years, but he had to up them -- up it because the
9 depression was huge and the anxiety got worse. Like I
10 was having panic attacks on a daily basis to the point
11 where I almost went agoraphobic and couldn't leave the
12 house, so.

13 Q And how often before that, your termination from Henry
14 Ford, were you taking Paxil?

15 A I took Paxil every day since 2001. However, after the
16 termination at Henry Ford it needed to be upped and
17 adjusted, and now I take 50 milligrams of Paxil instead
18 of 20 milligrams of Paxil, and I also take Xanax to calm
19 my nerves for the anxiety and panic attacks this lawsuit
20 has caused me.

21 Q And what do you mean this lawsuit has caused you?

22 A The stress of knowing I have to testify about my rape and
23 you're going to ask me questions about that has caused
24 tremendous stress, the questions that you want to ask me
25 about, just this whole thing. I mean it's caused a lot

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1 A I have no clue.

2 Q Well, don't you know that that's the patient's name?

3 A Possibly.

4 Q Do you know that I got this from your lawyer with the
5 patient's name not redacted?

6 A Possibly.

7 Q And if you took this without redacting the patient's name
8 that would have been inappropriate and a violation of
9 HIPAA, wouldn't it?

10 MR. FLYNN: Objection. Calls for a legal
11 conclusion.

12 THE WITNESS: I'm not a lawyer.

13 INNOCENT/ISN'T

14 Q (Continuing by Mr. Miglio): Isn't that what you said
15 earlier, that taking information that identified patients
16 would be a violation of the law, HIPAA?

17 MR. FLYNN: Objection.

18 MR. MIGLIO: I mean we can go back and look for
19 it.

20 MR. FLYNN: Objection. Misconstrues her
21 earlier testimony and calls for a legal conclusion.

22 Q (Continuing by Mr. Miglio): So what I want to know is --

23 A I'm not a lawyer.

24 Q I didn't say you were. What I want to know is why did
25 you keep a copy of this information with the patient's